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ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
MICHAEL ARENAS	§	CASE NO. 19-42075
	§	
NICOLE ARENAS	§	Chapter 13
	§	
DEBTORS.	§	

DEBTOR'S ATTORNEY'S APPLICATION FOR ADMINISTRATIVE EXPENSE

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

NO HEARING WILL BE CONDUCTED ON THIS OBJECTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS OBJECTION WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, Austin B. Butts, Attorney, to file this Application for Administrative Expense, and in support thereof would respectfully show the Court as follows:

1. This case was filed on August 2, 2019. Debtors' Attorney has performed all tasks expected of him up to this point in the case.

2. Debtors agreed to compensate Debtors' Attorney in the amount of \$3,000.00 in connection with this case. To date, Debtors' Attorney has received \$500.00 for the work performed in this case. The remaining balance of \$2,500.00 was to be paid to Debtors' Attorney out of the funds paid by Debtors to the Standing Chapter 13 Trustee. Debtors' Attorney has only received \$500.00 to date and does not expect to receive any other compensation in connection with this case.

WHEREFORE, Debtors' Attorneys, requests that:

- A. The Court allow Debtor's Attorney's the sum of \$3,000.00 as an administrative expense of the bankruptcy estate in this case, of which \$2,500.00 remains to be paid;
- B. \$96.20 in post-filing administrative postage and mailing expenses;
- C. The Court order, that upon the occurrence of any of the following: (1) confirmation of Debtors' Plan; (2) dismissal of this case; or (3) conversion of this case to another chapter of the bankruptcy code, the Standing Chapter 13 Trustee pay to Debtors' Attorney any funds on deposit with the trustee up to the sum of \$2,596.20; and should one of the above occur the Court shall retain jurisdiction for the purpose of this motion; and
- D. The Court grant Debtor's Attorney such other and further relief as he may show himself to be justly entitled.

Respectfully submitted,

PRATT LAW GROUP, PLLC

/s/Austin B. Butts

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing has been this date served electronically or mailed to the parties listed below.

CAREY D. EBERT
CHAPTER 13 TRUSTEE
PO Box 941166
Plano, Texas 75094-1166

US TRUSTEE
Office of the United States Trustee
110 North College Ave.
Tyler, Texas 75702

Debtors:

MICHAEL AND NICOLE ARENAS
4681 Maverick Way
Carrollton, Texas 75010

Dated this 6th day of November, 2019.

By: /s/ Austin B Butts